Before the Federal Communications Commission Washington, D.C. 20554

In the Matter of:)	
Comcast Cablevision of the District, LLC,)	CSR-6155-A
Comcast Cablevision of Maryland, Inc.,)	
Comcast Cablevision of Potomac, LLC,)	
& Comcast Cablevision of Virginia, Inc.)	
)	
For Modification of the Washington, D.C.)	
DMA)	

MEMORANDUM OPINION AND ORDER

Adopted: August 13, 2003 Released: August 15, 2003

By the Deputy Chief, Policy Division, Media Bureau:

I. INTRODUCTION

1. Comcast Cablevision of the District, LLC, Comcast Cablevision of Maryland, Inc., Comcast Cablevision of Potomac, LLC, and Comcast Cablevision of Virginia, Inc. ("Petitioner" or "Comcast") filed the above-captioned petition for special relief seeking to modify the Washington, D.C. designated market area ("DMA") with respect to television broadcast station WJAL (Ch. 68), Hagerstown, Maryland ("WJAL"). Specifically, Comcast requests that WJAL be excluded, for purposes of the cable television mandatory broadcast signal carriage rules, from the communities served by Petitioner's cable systems in and around Washington, D.C. An opposition to this petition was filed on behalf of Entravision Holdings, LLC, licensee of WJAL, to which Comcast replied. For the reasons stated below, we grant Comcast's request.

II. BACKGROUND

2. Pursuant to Section 614 of the Communications Act and implementing rules adopted by the Commission in *Implementation of the Cable Television Consumer Protection and Competition Act of 1992, Broadcast Signal Carriage Issues ("Must Carry Order")*, commercial television broadcast stations are entitled to assert mandatory carriage rights on cable systems located within the station's market.² A station's market for this purpose is its "designated market area," or DMA, as defined by Nielsen Media Research.³ A DMA is a geographic market designation that defines each television market exclusive of

²8 FCC Rcd 2965, 2976-1977 (1993).

¹See Appendix A.

³Section 614(h)(1)(C) of the Communications Act, as amended by the Telecommunications Act of 1996, provides that a station's market shall be determined by the Commission by regulation or order using, where available, commercial publications which delineate television markets based on viewing patterns. See 47 U.S.C. §534(h)(1)(C). Section 76.55(e) requires that a commercial broadcast television station's market be defined by Nielsen Media Research's DMAs. 47 C.F.R. § 76.55(e); see Definition of Markets for Purposes of the Cable (continued...)

others, based on measured viewing patterns. Essentially, each county in the United States is allocated to a market based on which home-market stations receive a preponderance of total viewing hours in the county. For purposes of this calculation, both over-the-air and cable television viewing are included.⁴

3. Under the Act, however, the Commission is also directed to consider changes in market areas. Section 614(h)(1)(C) provides that the Commission may:

with respect to a particular television broadcast station, include additional communities within its television market or exclude communities from such station's television market to better effectuate the purposes of this section.⁵

In considering such requests, the 1992 Cable Act provides that:

the Commission shall afford particular attention to the value of localism by taking into account such factors as –

- (I) whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community;
- (II) whether the television station provides coverage or other local service to such community;
- (III) whether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of concern to such community or provides carriage or coverage of sporting and other events of interest to the community;
- (IV) evidence of viewing patterns in cable and noncable households within the areas served by the cable system or systems in such community.⁶

The legislative history of the provision states that:

where the presumption in favor of [DMA] carriage would result in cable subscribers losing access to local stations because they are outside the [DMA] in which a local cable system operates, the FCC may make an adjustment to include or exclude particular communities from a television station's market consistent with Congress' objective to ensure that television stations be carried in the area in which they serve and which form their economic market.

Television Broadcast Signal Carriage Rules, Order on Reconsideration and Second Report and Order, 14 FCC Rcd 8366 (1999)("Modification Final Report and Order").

2

^{(...}continued from previous page)

⁴For a more complete description of how counties are allocated, *see* Nielsen Media Research's *Nielsen Station Index: Methodology Techniques and Data Interpretation.*

⁵47 U.S.C. §534(h)(1)(C).

 $^{^{6}}Id.$

* * * *

[This subsection] establishes certain criteria which the Commission shall consider in acting on requests to modify the geographic area in which stations have signal carriage rights. These factors are not intended to be exclusive, but may be used to demonstrate that a community is part of a particular station's market.⁷

In adopting rules to implement this provision, the Commission indicated that requested changes should be considered on a community-by-community basis rather than on a county-by-county basis, and that they should be treated as specific to particular stations rather than applicable in common to all stations in the market.⁸

- 4. In the *Modification Final Report and Order*, the Commission, in an effort to promote administrative efficiency, adopted a standardized evidence approach for modification petitions that requires the following evidence be submitted:
 - (1) A map or maps illustrating the relevant community locations and geographic features, station transmitter sites, cable system headend locations, terrain features that would affect station reception, mileage between the community and the television station transmitter site, transportation routes and any other evidence contributing to the scope of the market.
 - (2) Grade B contour maps delineating the station's technical service area and showing the location of the cable system headends and communities in relation to the service areas.

Note to Paragraph (b)(2): Service area maps using Longley-Rice (version 1.2.2) propagation curves may also be included to support a technical service exhibit.⁹

- (3) Available data on shopping and labor patterns in the local market.
- (4) Television station programming information derived from station logs or the local edition of the television guide.
- (5) Cable system channel line-up cards or other exhibits establishing historic carriage, such as television guide listings.
- (6) Published audience data for the relevant station showing its

⁷H.R. Rep. 102-628, 102d Cong., 2d Sess. 97 (1992).

⁸Must Carry Order, 8 FCC Rcd 2965, 2977 n.139.

⁹The Longley-Rice model provides a more accurate representation of a station's technical coverage area because it takes into account such factors as mountains and valleys that are not specifically reflected in a traditional Grade B contour analysis. In situations involving mountainous terrain or other unusual geographical features, Longley-Rice propagation studies can aid in determining whether or not a television station actually provides local service to a community under factor two of the market modification test.

average all day audience (i.e., the reported audience averaged over Sunday-Saturday, 7 a.m.-1 a.m., or an equivalent time period) for both cable and noncable households or other specific audience indicia, such as station advertising and sales data or viewer contribution records. ¹⁰

Petitions for special relief to modify television markets that do not include the above evidence shall be dismissed without prejudice and may be re-filed at a later date with the appropriate filing fee. The *Modification Final Report and Order* provides that parties may continue to submit whatever additional evidence they deem appropriate and relevant.

III. DISCUSSION

- 5. The issue before us is whether to grant Comcast's request to exclude WJAL from mandatory carriage on the subject cable systems. All of the communities at issue are located in the Washington, D.C. DMA, as is WJAL, which is licensed to Hagerstown, Maryland. Considering all of the relevant factual circumstances in the record, we believe that the market modification petition is a legitimate request to redraw DMA boundaries to make them congruous with market realities.
- The first statutory factor we must consider is "whether the station, or other stations located in the same area, have been historically carried on the cable system or systems within such community." Comcast argues that WJAL has never been carried on the subject cable systems, despite being on-the-air for more than 15 years. 12 Comcast asserts that such a long operation without cable carriage is compelling evidence of a lack of nexus between WJAL and the communities.¹³ Comcast states that Congress sought information with respect to historic carriage in an effort to avoid disruption of established viewing patterns and to ensure that stations did not lose access to existing cable audiences.¹⁴ It maintains that because WJAL has never been carried on the systems, there would be no disruption to established viewing patterns nor would the action deprive WJAL of existing cable audience. WJAL argues that the Commission has recognized that lack of carriage is often due to non-geographic reasons and, in such instances, does not treat the historical carriage factor as outcome determinative. 15 WJAL submits that because it has been operating under its new ownership for only two years, it warrants treatment as a new station for purposes of historical carriage.¹⁶ In this regard, WJAL notes that the Commission has repeatedly held that the fact that a new station lacks historical carriage is of little or no relevance in modification cases because, otherwise, such stations would be prevented from ever gaining carriage.¹⁷ As a result, WJAL maintains that its lack of carriage should carry no weight in this

¹⁰47 C.F.R. §76.59(b).

¹¹47 U.S.C. §534(h)(1)(C).

¹²Modification Petition at 4.

 $^{^{13}}Id$.

¹⁴*Id.*, citing H.R. Rep. No. 102-628, at 97 (1992).

¹⁵WJAL Opposition at 4, citing Comcast Cablevision of the South d/b/a Comcast of Oak Ridge, 15 FCC Red 15105, 15113 (2000).

¹⁶*Id*. at 4.

¹⁷Id. at 4-5, citing *Time Warner Entertainment Co., L.P.,* 12 FCC Rcd 22069, 22077 (1997); *Horizon Broadcasting Corporation,* 12 FCC Rcd 11634, 11638 (1997); *Time Warner Cable,* 11 FCC Rcd 8047, 8053-54 (1996).

proceeding. Comcast argues in reply that the Commission has consistently held that while historical carriage may not be determinative in and of itself, it is significant, particularly when the broadcaster fails to meet the other statutory factors. In addition, Comcast asserts that WJAL's argument that it is effectively a "new" station simply because of a change in ownership and format should be discounted. During the 15 years of its operation, WJAL has filed previous must carry complaints and market modification petitions with the Commission that relied on the length of time it had been on-the-air. On the length of time it had been on-the-air.

Second, we consider "whether the television station provides coverage or other local service to such community."²¹ Comcast argues that a Longley-Rice contour study demonstrates that nearly all of the cable communities are beyond WJAL's Grade B service area.²² Indeed, Comcast notes that its Longley-Rice study shows that only two of the communities at issue fall within the fringe of WJAL's Grade B signal – Reston, Virginia and Barnesville, Maryland.²³ Comcast maintains that the absence of Grade B coverage is supported by the fact that signal strength studies taken at a number of the cable systems' principal headends demonstrates that WJAL does not provide an adequate off-air signal to the cable systems.²⁴ Comcast argues that this lack of coverage is hardly surprising considering that the average distance between WJAL's transmitter in Mercersburg, Pennsylvania and the subject communities is nearly 80 miles.²⁵ Comcast states that these distances easily exceed those found to justify previous market modification requests granted by the Commission.²⁶ Comcast argues further that the lack of nexus between WJAL and the communities is also demonstrated by the time it takes to drive between Hagerstown and the communities.²⁷ Comcast asserts that WJAL's situation is consistent with the "hub and spoke" model described by the U.S. Court of Appeals for the Second Circuit.²⁸ Comcast maintains that while some Hagerstown residents may look to the Washington, D.C. television stations, Washington, D.C. residents do not look to Hagerstown. Finally, Comcast argues that WJAL does not appear to provide any local programming to the communities at issue. Comcast states that, according to its website, WJAL's programming consists primarily of religious programs with a mix of general commercial and paid programming with no particular focus on the local needs and interests of the specific communities at issue.²⁹ Comcast states that in *Media General Cable of Fairfax County, Inc.*, the Commission concluded

¹⁸Reply at 4, citing Cablevision of Monmouth, Inc., 11 FCC Rcd 9314, 9322 (1996).

¹⁹*Id*. at 4.

²⁰Id. at 5, citing Good Companion Broadcasting, Inc. d/b/a Channel 68 Broadcasting, Inc., 11 FCC Rcd 4826, 4830 (1996).

²¹47 U.S.C. §534(h)(1)(C).

²²Modification Petition at Exhibit 3.

 $^{^{23}}Id.$

²⁴Id. at Exhibit 6. Comcast maintains that it is also unlikely that WJAL would be able to deliver a good quality off-air signal to the individual households in the cable communities.

²⁵Id. at Exhibit 1. Comcast states that the actual distances range from 51 miles to 103 miles.

²⁶Id. at 6, citing Greater Worcester Cablevision, Inc., 13 FCC Rcd 22220 (1998) (39-70 miles); Greater Worcester Cablevision, Inc., 12 FCC Rcd 17347 (1997) (38-61 miles); Time Warner Cable, 12 FCC Rcd 23249 (1997) (42-58 miles); Time Warner Cable, 11 FCC Rcd 13149 (1996) (45 miles); Cablevision of Cleveland, L.P. and V Cable, Inc., d/b/a Cablevision of Ohio, 11 FCC Rcd 18034 (1996) (41 miles).

²⁷Id. at Exhibit 7. Comcast states that driving time ranges from 2 hour, 17 minutes to nearly 2 hours.

²⁸Id. at 6-7, citing WLNY-TV, Inc. v. FCC, 163 F.3d 137 (2d Cir. 1998).

²⁹Id. at Exhibit 8. Comcast states that WJAL is also not listed in the television programming guide of *The Washington Post*.

that similarly-situated communities were so removed from WJAL that they ought not to be deemed part of the station's market for must carry purposes.³⁰ Comcast asserts that the same arguments apply here.

- 8. WJAL argues that Comcast conceded in its petition that WJAL provided a Grade B signal to the communities of Reston and Barnesville, but based upon the coverage maps attached to Comcast's petition, WJAL states that it is clear that it provides at least limited Grade B coverage to the communities of Poolesville, Washington Grove, Gaithersburg, Derwood and Potomac, Maryland as well. WJAL argues that Commission precedent supports including communities that lie on the periphery of a station's Grade B contour within its own DMA. WJAL states that it provides a broad range of programming intended to appeal to residents in the Comcast communities and throughout the DMA. Such programming includes news programs, coverage of local sports teams not available elsewhere, religious programming, sitcoms and dramas. Finally, WJAL argues that due to its ownership and programming changes, Comcast's reliance on *Media General* is therefore misplaced.
- 9. Comcast argues that WJAL does not even claim to provide Grade B contour coverage to most of the cable communities at issue nor does it offer any evidence that it provides an adequate off-air signal.³⁶ Instead, Comcast states, WJAL emphasizes its predicted Grade B contour coverage over a small number of communities, completely ignoring the Longley-Rice study that clearly demonstrates WJAL's general lack of Grade B coverage in these same communities.³⁷ Further, Comcast states that WJAL fails to provide any information to demonstrate that it offers programming that is specifically tailored to the communities at issue.³⁸ Comcast argues that WJAL's assertion that it provides a "broad range of programming" does not satisfy this requirement.³⁹ Moreover, Comcast states that the specific programs that WJAL does cite appear to be of more regional or national interest and are not sufficient to meet the local programming factor.⁴⁰ Finally, Comcast notes that WJAL completely ignores the significant geographic distance between the cable communities and Hagerstown, asserting only that it is "part of the same greater metropolitan Washington area as the Comcast communities."⁴¹
- 10. The third statutory factor we must consider is "whether any other television station that is eligible to be carried by a cable system in such community in fulfillment of the requirements of this section provides news coverage of issues of concern to such community or provides carriage or coverage

³⁰Id. at 7, citing 15 FCC Rcd 149 (2000) ("Media General").

³¹WJAL Opposition at 5, citing Modification Petition at Exhibit 3. WJAL states that once it commences its full-power digital operations, the number of communities it can reach will increase. *Id.*

³²Id., citing Maranatha Broadcasting Company, Inc., 13 FCC Rcd 1616, 1623 (1997); Blackstar of Ann Arbor, Inc., 11 FCC Rcd 14992, 15001 (1996); Greater Worcester Cablevision, Inc., 10 FCC Rcd 12569, 12573 (1995).

³³*Id*. at 6.

³⁴*Id.* at Exhibit 6.

³⁵*Id*. at 2.

³⁶Reply at 5.

 $^{^{37}}Id$

³⁸*Id*. at 6.

³⁹*Id.*, citing Opposition at 6.

⁴⁰*Id.* at 7

⁴¹*Id.* at 8, citing Opposition at 6.

of sporting and other events of interest to the community."42 Comcast states that the cable systems currently carry several stations licensed in an around Washington, D.C., all of which provide either Grade A or Grade B contour coverage as well as an off-air signal and extensive coverage of local news and sporting events.⁴³ In addition to these stations, Comcast states that it carries NewsChannel 8 and numerous local access channels, all of which focus on local news and events in and around the Washington, D.C. area. 44 In opposition, WJAL argues that Comcast ignores the fact that the Bureau has found that while a broadcast station may invoke this factor to claim that communities belong in its DMA. a cable operator may not bolster its claim for exclusion by arguing that it already carries stations that serve the local needs of the communities at issue. 45 WJAL states that in a petition for exclusion the third statutory factor simply drops out of the market modification analysis.⁴⁶ In any event, WJAL argues that all of the stations cited by Comcast are all large network television stations while WJAL is the only English-language independent station operating in the Washington D.C. DMA and its carriage would enrich the viewing options of the residents of the subject communities.⁴⁷ Comcast argues that WJAL's interpretation of the third statutory factor is in direct conflict with Commission practice. 48 Comcast states that the Commission has specifically stated that cable operators may use carriage of other local stations to support its market modification petitions.⁴⁹

- 11. The fourth statutory factor concerns "evidence of viewing patterns in cable and noncable households within the areas served by the cable system or systems in such community." Comcast argues that a viewership study was unable to find any ratings for WJAL in either cable or noncable households in any of the counties where the cable communities are located. Comcast maintains that this lack of viewership weighs strongly in favor of granting its request. WJAL argues that viewership levels should not be accorded substantial weight because it is still in the process of building its viewership since its change in programming two years ago. WJAL notes that the Commission has recognized that it "normally takes up to 3 years to build viewership within [stations'] licensed areas." Although Comcast agrees that it may take up to 3 years for a station to build viewership, the fact remains that WJAL has been in operation since 1987 and, as explained above, the suggestion that a 15-year old station should be granted new station status is simply unfounded.
- 12. WJAL also argues that Comcast's petition should be dismissed as procedurally defective because it was untimely filed after the Bureau's grant of two must carry complaints WJAL filed against

⁴²47 U.S.C. §534(h)(1)(C).

⁴³Modification Petition at Exhibits 5 and 9.

⁴⁴*Id.* at Exhibit 5.

⁴⁵WJAL Opposition at 7.

⁴⁶Id., citing Comcast Cablevision of Danbury, Inc., 18 FCC Rcd 4990 (2003).

⁴⁷*Id.* at 8.

⁴⁸Reply at 9.

⁴⁹Id., citing Media One of Massachusetts, Inc., 13 FCC Rcd 3017, 3025 (1998); Time Warner Entertainment-Advance/Newhouse Partnership, 13 FCC Rcd 5900, 5909 (1997).

⁵⁰47 U.S.C. §534(h)(1)(C).

⁵¹Modification Petition at Exhibit 10.

⁵²WJAL Opposition at 8, citing Avenue TV Cable Services, Inc., 16 FCC Rcd 16436, 16445 (2001).

⁵³Reply at 9-10.

Comcast.⁵⁴ WJAL argues that it went through the proper channels to get Comcast to fulfill its must carry obligations and now Comcast is abusing the market modification process in order to continue evading those obligations. WJAL maintains that Comcast's petition is inconsistent with Congressional intent which clearly stated that the market modification policy was not provided as a means for cable systems to avoid their must carry obligations.⁵⁵ Comcast argues in reply that WJAL's contention that Comcast is somehow barred from filing a market modification because of prior complaint proceedings is misplaced.⁵⁶ Comcast states that, far from abusing the market modification process, it is appropriately utilizing Commission procedures to assert that WJAL's market should be modified to exclude the subject communities due to a lack of nexus.⁵⁷ Comcast states that Congress determined that the market modification provisions "reflect a recognition that . . . a community within a station's DMA may be so far removed from the station that it cannot be deemed part of the station's market."58 Consistent with Congress' intent, Comcast states that the Commission's market modification process "allows stations to add or delete communities from their DMA to reflect their true marketplace."59 Moreover, Comcast argues, not only was it under no obligation to file a market modification petition prior to this time, but WJAL was put on notice that such a petition might be filed during the pendency of its must carry complaint.60

- 13. Initially, we note that WJAL is in error in its contention that the filing of Comcast's market modification petition was in any way procedurally defective. Section 76.59(a) of the Commission's rules gives both cable television systems and television broadcast stations the right to file for market modification.⁶¹ There is no restriction in the rules that limits when the petitioner must file its request. There is no doubt that WJAL was well within its rights to file must carry complaints against Comcast in order to secure carriage rights on various systems within its DMA. Nevertheless, a Commission grant of such complaints would not prohibit Comcast from filing a request for market modification.
- 14. Section 614(h)(1)(C) of the Communications Act authorizes the Commission to include or exclude particular communities from a television station's market for the purpose of ensuring that a television station is carried in the areas which it serves and which form its economic market.⁶² Section 614(h)(1)(C)(i) specifically and unambiguously directs the Commission, in considering requests for market modification, to afford particular attention to the value of localism by taking such matters into account.⁶³ In this matter, WJAL has no history of carriage and no discernable viewership in the communities at issue. WJAL has argued that because of its change in ownership and programming two years ago, it should be treated as a new station for the purposes of historic carriage and viewership. We

⁵⁴WJAL Opposition at 3, citing *Entravision Holdings, LLC*, 18 FCC Rcd 6514 (2003); *Entravision Holdings, LLC*, 18 FCC Rcd 8051 (2003).

⁵⁵Id., citing Kansas City Cable Partners, 10 FCC Rcd 3807, 3809 (1995).

⁵⁶Reply at 2.

⁵⁷*Id*. at 3.

⁵⁸*Id.*, citing H.R. Rep. No. 268, 103d Cong., 2d Sess. 97 (1992).

⁵⁹*Id.*, citing *DeSoto Broadcasting*, *Inc.*, 10 FCC Rcd 4491, 4493 (1995).

⁶⁰Id., at Exhibit 1.

⁶¹⁴⁷ C.F.R. § 76.59(a).

⁶²47 U.S.C. § 534(h)(1)(c).

⁶³47 U.S.C. § 534(h)(1)(C)(i).

disagree. Despite its change in status, WJAL has been on-the-air for approximately 15 years and A.C. Nielsen annually surveys the station for viewership in the Hagerstown and surrounding Washington, D.C. areas. Prior to the 2000 must carry election period, WJAL was not considered to be part of the Washington, D.C. market. As a result, prior to 2000, it would have been unlikely that WJAL would have achieved either mandatory carriage or viewership in communities located within the Washington, D.C. area. Because of this fact, we will give the historic carriage and viewership factors some weight, but they are not outcome determinative by themselves.

15. It is also clear that WJAL is geographically distant from the communities at an average of 80 miles; that, except for two communities, it fails to provide a Grade B signal according to Longley-Rice; and that it provides no locally-focused programming. Comcast argued that its request is supported by the fact that in the Bureau's decision in Media General, these same factors were cited when the Bureau granted the cable system's request to exclude WJAL and another Hagerstown television station, WHAG-TV, from carriage on its system serving several communities in Virginia. We agree. Although WJAL argued that reliance on *Media General* was misplaced because the station's programming had changed, it has offered no evidence that the programming it now provides is more locally-focused than that carried under the station's previous ownership. Finally, we note that although it is uncontested that WJAL is predicted by Longlev-Rice to provide Grade B coverage to two of the communities at issue, this factor alone is not sufficient to overcome the station's failure to meet any of the other market modification factors.

IV. **ORDERING CLAUSES**

- Accordingly, IT IS ORDERED, pursuant to Section 614(h) of the Communications Act 16. of 1934, as amended, 47 U.S.C. §534, and Section 76.59 of the Commission's rules, 47 C.F.R. §76.59, that the captioned petition for special relief (CSR-6155-A), filed by Comcast Cablevision of the District, LLC, Comcast Cablevision of Maryland, Inc., Comcast Cablevision of Potomac, LLC, and Comcast Cablevision of Virginia, Inc. IS GRANTED.
- This action is taken pursuant to authority delegated by Section 0.283 of the 17. Commission's rules.64

FEDERAL COMMUNICATIONS COMMISSION

Steven A. Broeckaert Deputy Chief, Policy Division Media Bureau

⁶⁴47 C.F.R. §0.283.

APPENDIX A

Community	CUID No.	County
Marine Barracks	DC0006	Wash. D.C.
Walter Reed Army	Becood	wush. B.C.
Medical Center	DC0007	"
Andrews AFB	MD0186	Prince George's
Beltsville	MD0388	"
Berwyn HeightsMD014		
Bladensburg	MD0141	44
Bowie	MD0200	"
Brentwood	MD0220	"
Cheverly	MD0174	"
College Park	MD0143	"
Colmar Manor	MD0221	"
Cottage City	MD0144	"
Edmonston	MD0144 MD0145	"
Glenarden	MD0145 MD0146	"
Greenbelt	MD0140 MD0172	"
Hyattsville	MD0172 MD0140	"
Landover Hills	MD0140 MD0147	44
Lanham	MD0390	"
Laurel	MD0390 MD0201	"
** ** *	MD0391	"
Montpelier Mount Rainier		"
	MD0148	"
New Carrollton	MD0171	"
North Brentwood	MD0149	"
Prince George's (N)	MD0172	"
Riverdale	MD0150	"
Seabrook	MD0389	"
Takoma Park	MD0383	"
University Park	MD0151	
Calvert	MD0250	Calvert
Bryans Road	MD0196	Charles
Charles	MD0178	"
Charles	MD0278	
Cobb Island	MD0267	"
Indian Head	MD0177	"
La Plata	MD0352	"
La Plata Town	MD0176	"
St. Charles	MD0033	"
St. Mary's	MD0279	St. Mary's
U.S. Naval Ord.		
Station-Indian Head	MD0351	Charles
Waldorf	MD0263	"
Capitol Heights	MD0183	Prince George's
District Heights	MD0165	"

Fairmount Heights	MD0182	٠.
Forest Heights	MD0185	Prince George's
Gaithersburg	MD0057	Montgomery
Morningside	MD0184	Prince George's
Seat Pleasant	MD0181	"
Upper MarlboroMD01	67	"
Rockville	MD0222	Montgomery
Barnesville	MD0229	"
Bethesda	MD0348	"
Boyds	MD0343	
Brookeville	MD0230	44
Burtonsville	MD0341	44
Cabin John	MD0347	"
		"
Chevy Chase	MD0223	"
Chevy Chase	MD0274	
Chevy Chase) (D) (27.5	"
Sec. IV	MD0275	
Chevy Chase		
Sec. V	MD0276	٠.
Chevy Chase Village	MD0277	٠
Derwood	MD0345	٠
Garrett Park	MD0231	"
Germantown	MD0340	"
Glen Echo	MD0233	"
Kensington	MD0234	44
Laytonsville	MD0235	"
Montgomery	MD0236	"
Olney	MD0346	"
Poolesville	MD0228	٠.
Potomac	MD0342	44
Silver Spring	MD0224	44
Somerset	MD0224 MD0226	"
Takoma Park	MD0226	"
		"
Washington Grove	MD0225	"
Wheaton	MD0344	
Alexandria	VA0220	Fairfax
Fort Myer	VA0373	
Arlington	VA0108	Arlington
Eastern Prince		
William	VA0019	Prince William
Dale City	VA0595	
Dumfries	VA0280	٠
Gainesville	VA0432	"
Haymarket	VA0433	"
Lake Ridge	VA0287	"
Manassas	VA0398	"
Manassas Park	VA0315	٠
Manassas Park (City)	VA0316	"
Prince William	VA0241	"
Prince William	VA0616	"
Prince William (E)	VA0617	Prince William
Timee william (L)	V 11001 /	Timee william

Prince William (W)	VA0329	۲,
Quantico	VA0173	"
Quantico	VA0242	"
Triangle	VA0596	44
Woodbridge	VA0597	۲,
Fort Belvoir	VA0267	Fairfax
Reston	VA0046	"